

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

Case No. 13-30993 GFK

In re:

VICTOR CARMEN DORSO,

Debtor.

**RESPONSE TO MOTION TO
DISMISS CHAPTER 13 CASE**

COMES NOW, VICTOR CARMEN DORSO, by and through his attorney, and for his Answer to the Motion to Dismiss filed by the Chapter 13 Trustee, state and allege as follows:

1. The debtor fell behind on his plan payments due to a job loss in June 2014. The debtor only was recently employed again. change by Mr. Balthazor which interrupted the household income.
2. Counsel, having just been provided with said information, has advised the debtor of his options to cure the arrears, modify the Chapter 13 plan, or convert the case to Chapter 7.
3. The debtor and counsel respectfully requests that the Court continue the trustee's motion to dismiss to the September calendar. This brief continuance will allow the debtor to decide (and counsel implement) a course of action.

WHEREFORE, the debtor requests that this Court enter an Order continuing the matter to the September 2014 confirmation calendar.

LAMEY LAW FIRM, P.A.

/e/ John D. Lamey, III

Dated: August 27, 2014

John D. Lamey, III, I.D. #0312009
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Case No. 13-30993 GFK

In re:

VICTOR CARMEN DORSO

UNSWORN CERTIFICATE
OF SERVICE

Debtors.

I, John D. Lamey, III, attorney with the LAMEY LAW FIRM, P.A., 980 Inwood Ave. N, Oakdale, MN 55128, declare that on August 27, 2014, I served the RESPONSE TO MOTION TO DISMISS to the United States Bankruptcy Court, by electrically filing, and to each person or entity named below by mailing to each of them a copy thereof by enclosing the same in an envelope with first class mail postage prepaid and depositing the same in the post office in St. Paul, Minnesota, addressed to each of the following:

VICTOR CARMEN DORSO via electronic mail)

and delivered by email notification under CM/ECF on the day e-filed with the Court to each entity below:

Patti H Bass on behalf of Interested Party Capital One, N.A.
ecf@bass-associates.com

Gregory A Burrell
cmecfjzkmn@ch13mn.com

US Trustee
ustpreion12.mn.ecf@usdoj.gov

And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: August 27, 2014

/e/ John D. Lamey, III

John D. Lamey, III, Esq.